

**Rapaport Law Firm, PLLC**  
**80 Eighth Avenue, Suite 206**  
**New York, NY 10011**  
212.382.1600  
www.RapaportLaw.com

**INVOICE/STATEMENT OF  
SERVICES**

March 10, 2023

Matter Name: Trinidad et al. v. Joy et al.

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
		<u>Marc A. Rapaport</u>		
12/30/2021	MR	Meeting with Mr. Trinidad and Fernandez; draft complaint	1.50 450.00/hr	675.00
1/3/2022	MR	Meeting with clients; further edits to complaint	2.00 450.00/hr	900.00
1/5/2022	MR	Continuing drafting complaint; discussions with clients in connection with same; filing of same	2.00 450.00/hr	900.00
2/11/2022	MR	Telephone call with Mr. Trinidad with K Gulfo as Spanish language interpreter	0.20 450.00/hr	90.00
	MR	Telephone call with defendants' counsel, Mr. Smikun	0.20 450.00/hr	90.00
2/15/2022	MR	Draft emails to defts' counsel; review court orders re. court supervised settlement	0.50 450.00/hr	225.00
2/18/2022	MR	Email comm's with Defts' counsel	0.10 450.00/hr	45.00
2/22/2022	MR	Discussions with defts' counsel	0.20 450.00/hr	90.00
2/23/2022	MR	Review Court's Order; email to Mr. Smikun	0.10 450.00/hr	45.00
3/1/2022	MR	Draft and file letter motion for extension of time to file answer to Defts' counterclaims; email comm's with Defts' counsel re. same and discovery deadlines	0.60 450.00/hr	270.00
3/2/2022	MR	Attn.: to pre-mediation discovery; multiple teleph calls with Mr. Trinidad and Mr. Fernandez	2.00 450.00/hr	900.00
3/4/2022	MR	Draft motion to dismiss Defendants' counterclaims	4.00 450.00/hr	1,800.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/8/2022	MR	In-office meeting with Mr. Trinidad and Mr. Fernandez; K. Gulfo as interpreter	1.00 450.00/hr	450.00
3/11/2022	MR	Meeting re. damages calculations with K. Gulfo and J.O.	1.00 450.00/hr	450.00
3/15/2022	MR	Consider and analyze issues pertinent to settlement demand	0.50 450.00/hr	225.00
3/28/2022	MR	T/C with Mr. Trinidad re. discovery materials; K. Gulfo as interpreter	1.00 450.00/hr	450.00
3/29/2022	MR	Draft letter to Judge Furman re: pending motion is now moot	0.50 450.00/hr	225.00
3/30/2022	MR	T/C with Mr. Trinidad - K. Gulfo as interpreter	0.50 450.00/hr	225.00
	MR	Draft email to defendants' counsel re: pre-settlement conference discovery; settlement conference procedures; review defendants' pre-conference discovery production in connection with same; review conference procedures; review damages chart in light of defendants' production	1.50 450.00/hr	675.00
4/4/2022	MR	Telephone call with Defendants' counsel re settlement-related issues	0.40 450.00/hr	180.00
	MR	Teleph call with Mr. Trinidad; KG as interpr	0.40 450.00/hr	180.00
4/5/2022	MR	Attention to confidential pre-settlement conf letter	8.00 450.00/hr	3,600.00
4/6/2022	MR	Receive and review defs' pre settlement conf letter; receive and review email from Judge Gorenstein's chambers.	0.60 450.00/hr	270.00
	MR	Teleph call with Mr. Smikun	0.10 450.00/hr	45.00
	MR	Meeting in office with all three plaintiffs. Extensive review/discussion of pre-conf letters and status; receive further background materials from clients. K Gulfo as interpreter	1.00 450.00/hr	450.00
4/7/2022	MR	Review defendants' letter motion addressed to Judge Furman renewing Defendants' motion to adjourn settlement conference; legal research relating to issuance of sanctions against parties for bad faith in court-mandated settlement procedures; draft response to letter motion;	2.50 450.00/hr	1,125.00
4/12/2022	MR	Teleph call with Mr. Trinidad; discussion with KG re same	0.20 450.00/hr	90.00
4/14/2022	MR	Meeting with Trinidad in office	1.00 450.00/hr	450.00
4/21/2022	MR	Draft joint letter and file same	3.00 450.00/hr	1,350.00

		<u>Hrs/Rate</u>	<u>Amount</u>
4/22/2022	MR Receive and review documents from Mr. Trinidad's Civil Court attorney; discussion with counsel; edits to proposed landlord/tenant settlement agreement for purpose of ensuring that client's interests in this case are not impaired	1.00 450.00/hr	450.00
4/23/2022	MR Telephone call with Mr. Fernandez and his wife; review documents/comm's provided by Mr. Fernandez (KG as interpreter)	0.70 450.00/hr	315.00
4/25/2022	MR TC with Fernandez	0.60 450.00/hr	270.00
5/10/2022	MR Attention to: drafting amended complaint; draft interstate commerce section; comm's with Mr. Fernandez; comm's with K. Gulfo; review comm's between plaintiffs and defendants	3.00 450.00/hr	1,350.00
5/12/2022	MR Attention to drafting of amended complaint; review of production and TC with Mr. Fernandez and Mr. Trinidad, K. Gulfo as interpreter	3.00 450.00/hr	1,350.00
5/26/2022	MR Edits to Plaintiffs' Demand for Production and Rogs; approve same for service on defendants' counsel	1.00 450.00/hr	450.00
6/13/2022	MR Receive and review defendants' document demands and interrogatories	1.00 450.00/hr	450.00
	MR Review recent decisions relating to contention interrogatories in SDNY	0.80 450.00/hr	360.00
6/15/2022	MR Attn to discovery	0.50 450.00/hr	225.00
6/27/2022	MR Attn to drafting document demand responses and objections	2.00 450.00/hr	900.00
6/28/2022	MR Attn to responses to Defts' interrogatories	2.50 450.00/hr	1,125.00
7/2/2022	MR Attn to discovery; call with Jeremy Fernandez	3.00 450.00/hr	1,350.00
7/11/2022	MR Attn to rog responses and meeting with Mr. Sanchez; K. Gulfo as interpreter	1.50 450.00/hr	675.00
7/22/2022	MR Teleph call with Mr. Trinidad	0.40 450.00/hr	180.00
	MR Telephone call with Mr. Fernandez, with KG as interpreter	0.20 450.00/hr	90.00
	MR Further tel. call with Mr. Trinidad with KG as interpreter; extensive review of discovery with client	1.00 450.00/hr	450.00
7/28/2022	MR Draft discovery related letter to Mr. Smikun	3.00 450.00/hr	1,350.00
7/29/2022	MR TC with forensic expert	0.10 450.00/hr	45.00

			<u>Hrs/Rate</u>	<u>Amount</u>
8/3/2022	MR	Email comm's with Mr. Smikun re discovery issues; meet and confer scheduling	0.10 450.00/hr	45.00
	MR	Draft letter motion for extension of discovery cut-off; email with defs' counsel re same	0.50 450.00/hr	225.00
8/10/2022	MR	Attn to discovery related issues	1.00 450.00/hr	450.00
8/11/2022	MR	Meet and confer; prepare for same	1.50 450.00/hr	675.00
8/18/2022	MR	Meeting in office with Mr. Fernandez; review additional documents from clients	1.00 450.00/hr	450.00
8/22/2022	MR	Attn to discovery and discovery related issues/disputes	1.00 450.00/hr	450.00
8/31/2022	MR	Tel. call with Mr. Smikun	0.10 450.00/hr	45.00
	MR	Further attention to request for conference re discovery disputes	1.00 450.00/hr	450.00
9/1/2022	MR	Meet and confer telephone call with defendants' counsel; extensive preparation for same	1.00 450.00/hr	450.00
9/7/2022	MR	Email to defts' counsel re. discovery related issues	0.20 450.00/hr	90.00
9/8/2022	MR	Emails with Mr. Smikun regarding unresolved discovery issues	0.20 450.00/hr	90.00
9/28/2022	MR	Receive and review further documents from clients	1.00 450.00/hr	450.00
9/29/2022	MR	Telephone call with Mr. Smikun re: court-ordered status update due on 9/30/22	0.10 450.00/hr	45.00
	MR	Receive and review draft status letter from defendants' counsel	0.40 450.00/hr	180.00
10/20/2022	MR	Discovery conf before Judge Rochon via Teams; prep for same	1.50 450.00/hr	675.00
10/25/2022	MR	Tel. call with clients; K. Gulfo as interpreter	1.00 450.00/hr	450.00
11/7/2022	MR	Attn to response to Defts' deficiency letter	4.00 450.00/hr	1,800.00
11/14/2022	MR	T/C with clients; KG as interpreter	0.20 450.00/hr	90.00
11/15/2022	MR	Attn to discovery issues and emails with defts' counsel; draft letter to Court	2.00 450.00/hr	900.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/15/2022	MR Prepare for and participate in call with depts' counsel re. discovery related issues and depositions	1.00 450.00/hr	450.00
11/17/2022	MR Further review of defendants' deficient supplemental discovery responses; LR relating to FRCP 33, and 2nd Cir decisions interpreting same; consider strategy relating to same.	1.50 450.00/hr	675.00
11/18/2022	MR Telephone call with Bank of America re: BOA's refusal to comply with document subpoena	0.20 450.00/hr	90.00
	MR Receive and respond to Mr. Kataev's email regarding defendants' objection to subpoena served on Bank of America	0.20 450.00/hr	90.00
11/20/2022	MR Meeting with Mr. Trinidad and Mr. Fernandez	3.00 450.00/hr	1,350.00
11/23/2022	MR Prepare and attend virtual conf; emails with depts' counsel	1.50 450.00/hr	675.00
11/25/2022	MR Meeting with Mr. Trinidad re: deposition preparation; review all documents in case in connection with same. KG as interpreter	3.50 450.00/hr	1,575.00
	MR Meet and confer telephone call with defendants' counsel; receive and review defendants' letter motion	0.50 450.00/hr	225.00
	MR Review uploaded documents for further production to defendants; meetings with KG re same	0.60 450.00/hr	270.00
11/27/2022	MR Deposition preparation	3.00 450.00/hr	1,350.00
11/28/2022	MR Attend deposition of Mr. Trinidad	10.00 450.00/hr	4,500.00
11/30/2022	MR Emails with defendants' counsel re deposition schedule	0.20 450.00/hr	90.00
	MR LR re: retaliation	1.50 450.00/hr	675.00
12/1/2022	MR Telephone call with Mr. Trinidad with K Gulfo as interpreter	0.20 450.00/hr	90.00
	MR Review defendants' pre-settlement conference letter	1.00 450.00/hr	450.00
	MR Emails with defendants' counsel re: suggest that we speak prior to settlement conf.	0.20 450.00/hr	90.00
12/2/2022	MR Legal research/preparation for settlement conf.	2.00 450.00/hr	900.00
	MR Extensive meeting with Mr. Trinidad, K. Gulfo as interp.	2.00 450.00/hr	900.00
12/3/2022	MR Meeting in office with Mr. Fernandez	1.00 450.00/hr	450.00

			<u>Hrs/Rate</u>	<u>Amount</u>
12/4/2022	MR	Attn to response to defts' motion to dismiss; prepare for settlement conference	6.00 450.00/hr	2,700.00
12/5/2022	MR	Settlement conference	4.00 450.00/hr	1,800.00
12/7/2022	MR	Meeting with clients, K. Gulfo as interp.; T/C with Magis. J. Gorenstein; comm's with Defts' counsel	1.30 450.00/hr	585.00
12/14/2022	MR	Receive defendants' counsel's edits to joint letter to Court	0.20 450.00/hr	90.00
12/28/2022	MR	Emails with defendants' counsel; review scheduling order; review Judge Gorenstein's individual rules relating to adjournments NO CHARGE		NO CHARGE
12/29/2022	MR	Revise letter motion to extend deadlines for submitting Cheeks and Attys' fees motion; email comm's with defendants' counsel Kataev	0.40 450.00/hr	180.00
1/4/2023	MR	Email to Defendants' counsel re: follow up on status of draft agreement NO CHARGE	0.10	NO CHARGE
1/11/2023	MR	Review 12/29/22 order; email comm's with Mr. Kataev re: dispute concerning requirements contained in 12/29/22 order	0.40 450.00/hr	180.00
	MR	Initial review of draft settlement agreement	0.50 450.00/hr	225.00
1/17/2023	MR	Extensive edits to settlement agreement	3.50 450.00/hr	1,575.00
1/18/2023	MR	Further edits to draft settlement agreement	0.50 450.00/hr	225.00
	MR	Discussions with KG re Cheeks letter NO CHARGE	0.40	NO CHARGE
	MR	Email with defendants' counsel re: their request for meet-and-confer call and attaching proposed, revised settlement agreement	0.20 450.00/hr	90.00
1/19/2023	MR	LR re: defendants' letter motion of this morning requesting award of attorney's fees/to compel; outline response to same	1.50 450.00/hr	675.00
	MR	Receive and review Defendants' letter motion	0.50 450.00/hr	225.00
	MR	Draft initial sections of Cheeks letter	1.50 450.00/hr	675.00
	MR	Receive letter from Smikun re request for consent to adjourn tomorrow's conference and respond to same	0.20 450.00/hr	90.00
	MR	Plan and prepare for court hearing scheduled for tomorrow morning; review recent scheduling orders and comm's with defendants' counsel	0.70 450.00/hr	315.00
1/20/2023	MR	Court conference before Judge Gorenstein	0.20 450.00/hr	90.00

			<u>Hrs/Rate</u>	<u>Amount</u>
1/25/2023	MR	Draft Cheeks letter for approval of settlement agreement	3.00 450.00/hr	1,350.00
1/30/2023	MR	Tel. call to Mr. Kataev re: status of revisions to draft settlement; leave vm; email to Mr. Kataev and Mr. Smikun re same	0.10 450.00/hr	45.00
2/6/2023	MR	Further edits to draft settlement and Cheeks letter; email same to defendants' counsel	0.50 450.00/hr	225.00
2/9/2023	MR	Review/edit Defendants' revised settlement agreement	0.60 450.00/hr	270.00
2/13/2023	MR	Further edits to letter motion for extension of time to file Cheeks application; email comm's with defs' counsel; discussions with KG	0.50 450.00/hr	225.00
2/14/2023	MR	Further review of and edits to settlement agreement	0.50 450.00/hr	225.00
2/21/2023	MR	Email to defs' counsel following up on agreement. NO CHARGE	0.10	NO CHARGE
3/2/2023	MR	Meeting with Jeremy Fernandez	0.50 450.00/hr	225.00
3/3/2023	MR	Finalize Cheeks applic NO CHARGE	0.50	NO CHARGE
	MR	Meeting with Herrera Sanchez	1.00 450.00/hr	450.00
	MR	Attention to Cheeks filing; comm's with defendants' counsel	0.50 450.00/hr	225.00
SUBTOTAL:			[ 142.70	63,720.00]
<u>Joselin Orellana</u>				
1/13/2022	JO	Attention to damage calculations	3.00 95.00/hr	285.00
1/27/2022	JO	Attention to discovery review	1.50 95.00/hr	142.50
3/11/2022	JO	Meeting with MR and KG re. damages; edits to same	1.20 95.00/hr	114.00
3/30/2022	JO	Attention to detailed index of plaintiffs' production relating to overtime and weekend work performed by Plaintiffs	2.50 95.00/hr	237.50
4/2/2022	JO	Attention to detailed index of plaintiffs' production relating to overtime and weekend work performed by Plaintiffs [continued]	1.00 95.00/hr	95.00
4/6/2022	JO	Finalize detailed index of plaintiffs' production relating to overtime and weekend work performed by Plaintiffs; send same to K. Gulfo and MR	0.30 95.00/hr	28.50
6/29/2022	JO	Organize, index and file Defts' production	1.50 95.00/hr	142.50

			<u>Hrs/Rate</u>	<u>Amount</u>
SUBTOTAL:			[ 11.00	1,045.00]
1/20/2022	MC	Comm's with Mr. Trinidad; email same to MR	0.20 115.00/hr	23.00
3/18/2022	MC	Comm's with Mr. Trinidad	0.20 115.00/hr	23.00
4/5/2022	MC	Teleph call with MR and Mr. Trinidad; interpret	0.40 115.00/hr	46.00
11/16/2022	MC	Meeting with Herrera Sanchez	4.00 115.00/hr	460.00
11/22/2022	MC	Meeting with Herrera Sanchez	3.00 115.00/hr	345.00
11/26/2022	MC	T/Cs with Mr. Trinidad	0.60 115.00/hr	69.00
11/28/2022	MC	Attend deposition of Mr. Trinidad	10.00 115.00/hr	1,150.00
SUBTOTAL:			[ 18.40	2,116.00]
<u>Karina Gulfo</u>				
12/27/2021	KG	T/C with Gilberto Trinidad; obtain info and email same to MR	0.30 115.00/hr	34.50
12/30/2021	KG	Initial meeting with Mr. Trinidad and Mr. Fernandez; interpret during same	1.50 115.00/hr	172.50
1/2/2022	KG	T/C with Mr. Trinidad	0.10 115.00/hr	11.50
1/3/2022	KG	Meeting with Mr. Fernandez, Mr. Trinidad and Mr. Sanchez; interpret during same; draft retainers	2.00 115.00/hr	230.00
1/4/2022	KG	Arrange for cell phone data extraction with IT expert; comm's with same; meet with Mr. Fernandez in office	0.80 115.00/hr	92.00
1/5/2022	KG	Proofread and edit complaint; complete summonses; assist with filing of same via ECF	1.50 115.00/hr	172.50
	KG	T/Cs with Mr. Fernandez and email comm's with phone data expert	0.50 115.00/hr	57.50
1/31/2022	KG	Comm's with Mr. Fernandez	0.20 115.00/hr	23.00
2/1/2022	KG	Email with process server	0.10 115.00/hr	11.50
2/11/2022	KG	T/C with family member of Mr. Herrera	0.10 115.00/hr	11.50



			<u>Hrs/Rate</u>	<u>Amount</u>
2/11/2022	KG	Email to process server	0.10 115.00/hr	11.50
	KG	TC with Mr. Trinidad, interpret during same	0.20 115.00/hr	23.00
2/15/2022	KG	Texts comm's to Mr. Trinidad; start draft letter to attys for defts	0.20 115.00/hr	23.00
2/22/2022	KG	TCs with Mr. Trinidad	0.20 115.00/hr	23.00
2/25/2022	KG	File joint letter to Judge Gorenstein via ECF	0.10 115.00/hr	11.50
	KG	Draft letter to Judge Gorenstein; review Judge Gorenstein's Rules and 115.00/hr Court Order directing settlement conference(Dkt. 11); send same to MR	0.50 115.00/hr	57.50
3/1/2022	KG	Proofread letter request to Judge Furman	0.10 115.00/hr	11.50
	KG	Attention to discovery index	0.60 115.00/hr	69.00
3/2/2022	KG	Attention to prep of discovery; review same with MR, interpret during calls with clients	1.00 115.00/hr	115.00
3/4/2022	KG	Met with Mr. Trinidad in office; attention to production; interpret during meeting with MR	0.50 115.00/hr	57.50
	KG	Proofread and edit motion and assist with filing of same	1.50 115.00/hr	172.50
3/7/2022	KG	Emails with Magna Legal Service re. scheduling of interpreter	0.10 115.00/hr	11.50
	KG	Attention to discovery	1.00 115.00/hr	115.00
	KG	T/C with Mr. Fernandez and Mr. Trinidad - schedule appointment	0.10 115.00/hr	11.50
3/8/2022	KG	Meeting with Trinidad and Mr. Fernandez; interpret during same; prepare documents for clients' review	1.20 115.00/hr	138.00
3/11/2022	KG	T/C with nephew of Mr. Herrera Sanchez; email to MR re. same	0.20 115.00/hr	23.00
	KG	Attention to production; update plaintiffs' production index	0.50 115.00/hr	57.50
	KG	Follow-up email to interpreter services, Magna Legal	0.10 115.00/hr	11.50
	KG	Meeting with MR and JO re. damages; T/Cs with Mr. Fernandez and Mr. Trinidad	1.00 115.00/hr	115.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2022	KG	T/C and text message comm. to Mr. Trinidad	0.10 115.00/hr	11.50
	KG	T/C with Mr. Trinidad; interpret for MR; attn. to discovery; send same to Defts' counsel	2.00 115.00/hr	230.00
3/30/2022	KG	T/C with Mr. Trinidad and MR; further text comm's with Mr. Trinidad	0.70 115.00/hr	80.50
	KG	Attn to discovery; email to Mr. Smikun	1.00 115.00/hr	115.00
4/1/2022	KG	Email to Mr. Smikun	0.10 115.00/hr	11.50
4/4/2022	KG	Email to Mr. Trinidad	0.20 115.00/hr	23.00
	KG	Email with Mr. Smikun scheduling tel. call; proofread MR letter to Court	0.10 115.00/hr	11.50
	KG	Attention to hard-copy filing of Plaintiff's production	0.50 115.00/hr	57.50
	KG	Teleph call - with M Rapaport and client Trinidad; translate/participate; review discovery materials and notes from prior comm's	0.50 115.00/hr	57.50
4/5/2022	KG	Attention to/assist with pre-settlement conference letter	4.00 115.00/hr	460.00
	KG	Receive and review email from Jeremy Fernandez	0.20 115.00/hr	23.00
4/6/2022	KG	Meeting with Trinidad, Herrera and Fernandez in office; interpret during same	1.00 115.00/hr	115.00
4/8/2022	KG	Email to interpreter and T/Cs to clients	0.30 115.00/hr	34.50
4/13/2022	KG	Attn to communications with tech expert professional and extraction of cell phone data	1.00 115.00/hr	115.00
4/14/2022	KG	Meeting with Mr. Trinidad and MR	1.00 115.00/hr	115.00
4/19/2022	KG	Email comm's with cellular phone expert at I Can Fit It Inc.	0.30 115.00/hr	34.50
4/20/2022	KG	Proofread joint letter	0.20 115.00/hr	23.00
4/21/2022	KG	Proofread joint letter and edits to proposed case mgmt. plan; emails with Mr. Smikun	1.00 115.00/hr	115.00
4/22/2022	KG	Re-file civil case mgmt plan	0.10 115.00/hr	11.50

			<u>Hrs/Rate</u>	<u>Amount</u>
4/25/2022	KG	T/C with Jeremy Fernandez and MR	0.60 115.00/hr	69.00
	KG	Review Scheduling Order and calendar same	0.20 115.00/hr	23.00
5/9/2022	KG	Draft initial disclosures; send same to MR for review	0.70 115.00/hr	80.50
5/10/2022	KG	LR re. R. 26 discl	0.40 115.00/hr	46.00
	KG	Email to Mr. Fernandez	0.10 115.00/hr	11.50
5/31/2022	KG	T/C with Mr. Trinidad's daughter	0.10 115.00/hr	11.50
6/3/2022	KG	Review of defts' Answer to Amended Complaint	0.30 115.00/hr	34.50
6/13/2022	KG	Attn to discovery	2.00 115.00/hr	230.00
6/20/2022	KG	Attn to discovery responses and LR	2.50 115.00/hr	287.50
6/24/2022	KG	Attn to answering discovery; LR re. discovery related issues/responses and objections	3.00 115.00/hr	345.00
6/27/2022	KG	Attn to drafting document demand responses and objections	2.00 115.00/hr	230.00
6/28/2022	KG	Attn to discovery responses; LR re. same	3.50 115.00/hr	402.50
7/2/2022	KG	Attn to discovery	3.00 115.00/hr	345.00
7/7/2022	KG	Meeting with MR, Ms. Trinidad and Mr. Fernandez; obtain documents and take notes during same; further attn to discovery and rog responses	4.00 115.00/hr	460.00
7/8/2022	KG	Receive and review Defts' responses to demands to produce	1.50 115.00/hr	172.50
7/11/2022	KG	Attn to discovery and indexing of same	2.00 115.00/hr	230.00
	KG	Meeting with Mr. Sanchez and his nephew; interpret during same	1.00 115.00/hr	115.00
7/19/2022	KG	Edits to discovery responses	1.00 115.00/hr	115.00
7/21/2022	KG	Attn to discovery responses; send same to defts' counsel	1.00 115.00/hr	115.00

			<u>Hrs/Rate</u>	<u>Amount</u>
7/21/2022	KG	Review production and edit index	0.50 115.00/hr	57.50
7/26/2022	KG	T/C with Mr. Fernandez and text comm's with Mr. Trinidad; attn to index of defts' production	2.10 115.00/hr	241.50
7/29/2022	KG	TC with Jeremy Fernandez; attn to discovery dispute issues and indexing of defts' production	4.00 115.00/hr	460.00
8/5/2022	KG	T/C with Mr. Smikun, email to MR re. same	0.10 115.00/hr	11.50
8/22/2022	KG	Attn to discovery and review of clients' documents; update of index	3.00 115.00/hr	345.00
9/8/2022	KG	Attn to review of discovery re. defts' raised concern; email to MR re. same	0.70 115.00/hr	80.50
10/18/2022	KG	Prepare documents in preparation for 10/20 conference; draft letter to Judge Rochon	2.00 115.00/hr	230.00
10/19/2022	KG	T/C with family member of Mr. Herrera	0.10 115.00/hr	11.50
10/20/2022	KG	T/C with MR in prep for conf	0.50 115.00/hr	57.50
10/24/2022	KG	Attn to discovery, depo notices	2.00 115.00/hr	230.00
10/25/2022	KG	Call with clients	1.00 115.00/hr	115.00
11/7/2022	KG	Comm's with Trinidad and Fernandez	0.20 115.00/hr	23.00
	KG	Comm's with process server	0.20 115.00/hr	23.00
11/8/2022	KG	Edits to discovery response letter	0.20 115.00/hr	23.00
11/10/2022	KG	Attn to indexing of defts production	1.00 115.00/hr	115.00
11/14/2022	KG	TC with Trinidad, Fernandez and Sanchez; interpret during same; comm's with The Spanish Group translation services	0.40 115.00/hr	46.00
11/15/2022	KG	Prepare for call with defts' counsel	0.60 115.00/hr	69.00
11/16/2022	KG	Attn to discovery and depos preparation	1.00 115.00/hr	115.00
11/17/2022	KG	Attn to delivery of subpoena	0.30 115.00/hr	34.50

			<u>Hrs/Rate</u>	<u>Amount</u>
11/20/2022	KG	Meeting with Mr. Trinidad and Mr. Fernandez; interpret during same	3.00 115.00/hr	345.00
11/23/2022	KG	Meeting with Mr. Herrera; obtain documents	0.50 115.00/hr	57.50
11/28/2022	KG	Multiple calls with MR; prep for deposition; file opp letter	2.00 115.00/hr	230.00
	KG	T/c with Mr. Fernandez	0.10 115.00/hr	11.50
	KG	Emails with interpreter services at Magna Legal	0.20 115.00/hr	23.00
	KG	Edits to damages chart; email to MR re. same	1.50 115.00/hr	172.50
11/30/2022	KG	T/C with Herrera	0.10 115.00/hr	11.50
12/2/2022	KG	Extensive meeting with Mr. Trinidad; interpret during same	2.00 115.00/hr	230.00
12/5/2022	KG	Meeting with Mr. Sanchez; prep for settlement conf; call with Magna Legal interpreters	0.60 115.00/hr	69.00
12/6/2022	KG	Attn to billing expenses/lodestar review NO CHARGE	3.00	NO CHARGE
12/7/2022	KG	Meeting with Trinidad and Fernandez; T/C with Herrera Sanchez	1.00 115.00/hr	115.00
12/8/2022	KG	Draft letter to Bank of America	0.10 115.00/hr	11.50
12/29/2022	KG	T/C with Mr. Herrera - nephew re: [REDACTED] - NO CHARGE	0.10	NO CHARGE
1/30/2023	KG	Attn to lodestar NO CHARGE	0.50	NO CHARGE
2/4/2023	KG	Attn to draft stipulations of discontinuance	0.20 115.00/hr	23.00
2/6/2023	KG	T/C with Ms. Fernandez-Trinidad	0.10 115.00/hr	11.50
	KG	Review of Cheeks letter and agreement drafts; attn to formatting issues	0.50 115.00/hr	57.50
3/1/2023	KG	Communications with Mr. Trinidad	0.20 115.00/hr	23.00
3/2/2023	KG	Meeting with Jeremy Fernandez, interpret	0.50 115.00/hr	57.50
	KG	Minor change to typo in agreement; send same to Defts' counsel	0.10 115.00/hr	11.50

		<u>Hrs/Rate</u>	<u>Amount</u>
3/3/2023	KG Finalize and file Cheeks applc; emails to depts' counsel; prepare exhibits NO CHARGE	1.00	NO CHARGE
	KG Meeting with Herrera Sanchez, interpret during same	1.00 115.00/hr	115.00
3/6/2023	KG Draft consent form; send same to Defts' counsel		NO CHARGE
3/8/2023	KG T/C with ECF Help Desk re. USMJ Gorenstein's request to file Cheeks applc. as letter motion NO CHARGE	0.10	NO CHARGE
	KG Re-file Cheeks application as letter motion pursuant to Judge Gorenstein's request NO CHARGE	0.10	NO CHARGE
SUBTOTAL:		[ 97.90	10,706.50]
For professional services rendered		270.00	\$77,587.50
Additional Charges :			
<u>Marc A. Rapaport</u>			
1/11/2022	Undisputed Legal Inc., Service of Process of Summons and Complaint on all Defendants		525.00
3/2/2022	Pacer US Courts		0.60
	Pacer US Courts		0.60
4/6/2022	In-house copies @ 0.25 per page		55.25
4/19/2022	Pacer		31.00
5/10/2022	In-house copies at 0.25 per page		55.25
11/25/2022	In-house copies at 0.25 per page		30.50
11/28/2022	Local Travel at .585 cents per mile		23.40
12/2/2022	In-house copies at 0.25 per page		30.50
12/3/2022	In-house copies at 0.25 per page		65.25
12/7/2022	Magna Legal Services, interpreter fees, Invoice No. 964363		595.00
12/21/2022	The Little Reporting Company Invoice 4298		852.75
SUBTOTAL:		[	2,265.10]
<u>Joselin Orellana</u>			
6/29/2022	in house copies		108.75
SUBTOTAL:		[	108.75]
<u>Karina Gulfo</u>			
1/5/2022	Filing Fee \$ 402.00, Receipt Number ANYSDC-25546397		402.00
1/7/2022	Invoice Re. Extraction of Cell Phone Data; I Can Fix It For You, Inc., Invoice No. 49100169		411.55
3/2/2022	In-house copies		13.00
3/8/2022	In-house copies		66.00
4/4/2022	in-house copies		69.50
4/6/2022	in-house copies		7.50
4/22/2022	IT expert fees, I Can Fix It For You Inc. Invoice No. 52090		141.54
4/25/2022	in-house copies		6.75
5/10/2022	in house copies		7.00
6/3/2022	in-house copies		4.00
6/28/2022	in house copies		12.50
7/2/2022	in house copies		16.25

	<u>Amount</u>
7/7/2022 in house copies	21.25
7/8/2022 In house copies	205.00
7/27/2022 In house copies	8.00
8/20/2022 In-house copies	40.50
10/18/2022 In-house copies	212.50
10/25/2022 SDNY Transcript	240.30
11/8/2022 Process server fees, Undisputed Legal Inc, Invoice No. 7921455	250.00
11/14/2022 The Spanish Group Certified Translation Order #246741	251.00
11/15/2022 The Spanish Group Translation Order #246984	100.00
11/16/2022 In-house copies	36.50
11/17/2022 Federal Express Shipping	31.40
11/28/2022 In-house copies	14.00
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SUBTOTAL:	[ 2,568.04]
	<hr/>
Total additional charges	\$4,941.89
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For professional services rendered	270.00 \$82,529.39

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Marc Rapaport	141.60	450.00	\$63,720.00
Marc Rapaport	1.10	0.00	\$0.00
Joselin Orellana	11.00	95.00	\$1,045.00
Karina Gulfo	93.10	115.00	\$10,706.50
Karina Gulfo	4.80	0.00	\$0.00
Marcela Cabezas	18.40	115.00	\$2,116.00